

## RE: Grant 2018-CY-BX-0025 Subaward Policy

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From: Worthington, Brenda (OJP) (Brenda.Worthington@usdoj.gov)

To: frednance@clickservices.org

## EXHIBIT 31

Cc: Andre.Bethea@usdoj.gov; Tracey.Willis@usdoj.gov; washhattie@gmail.com

Date: Thursday, February 14, 2019, 10:22 AM CST

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Good morning,

Thank you for your patience and I apologize for the delayed response.

I want to clarify that obligating funds prior to the removal of the special conditions that were on your award is a violation of the award agreement. We do understand that there may sometimes be a learning curve for new grant recipients on this topic, but your organization has received a grant from us before. That being said, I will only consider approval of retroactive obligations if your organization provides documentation that a policy has been implemented to ensure that obligations are not incurred prior to the removal of award special conditions that prohibit obligations, expenditures, and draw downs in the future.

The process for requesting retroactive approval: Your organization can submit a Program Office Approvals Grant Adjustment Notice (GAN) to request retroactive approval for the obligations that you incurred starting 10/1/18 that fall within the activities associated with developing your action plan (see special condition 28: "The recipient may incur obligations, expend, and draw down funds in an amount not to exceed \$100,000 for the sole purpose of establishing an action plan within 180 days of receiving final approval of the project's budget from OCFO. The grantee is not authorized to incur any additional obligations, make any additional expenditures, or drawdown any additional funds until BJA has reviewed and approved the grant recipient's completed action plan and has issued a Grant Adjustment Notice (GAN) removing this condition." Please provide your ledger as an attachment to the GAN that shows those obligations and also attach a narrative justification that connects those obligations with the grant funded project. Specifically, how those obligations are connected to the action plan. Participation in planning calls with our training and technical assistance provider, the Council of State Governments, as an example of activities that are associated with the action plan.

Thank you,

Brenda

Brenda M. Worthington

Division Chief

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